

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION d/b/a
SHAREHOLDER.COM ,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, ROBERT I. ADLER, JOHN
DOES 1 through 5 and JANE DOES 1 through 5,

Defendants.

Civil Action No. 04-10535-PBS

**PLAINTIFF SHAREHOLDER.COM'S MOTION FOR LEAVE TO SHARE
INFORMATION DESIGNATED BY DEFENDANTS AS "CONFIDENTIAL"
WITH THE ATTORNEY GENERAL'S OFFICE**

Shareholder.com ("Shareholder") moves for leave to share information that defendants have improperly designated as "confidential" with the Attorney General's Office for the Commonwealth of Massachusetts. Defendants rely on the Attorney General's investigation into Shareholder's claims to deny the allegations in the Complaint, yet defendants refuse to permit Shareholder to make a limited disclosure of information to the Attorney General's Office in order to have an informed discussion about the scope of its investigation. Based on information revealed during discovery, Shareholder believes that the Attorney General's account of its investigation into CCBN.com's conduct will be quite different from the defendants' account. In order to be fully informed about the investigation, which is central to defendants' denial of any wrongdoing, Shareholder must be permitted to share certain information it has obtained in discovery with the Attorney General's Office. For these reasons, and for the reasons

stated in Shareholder's memorandum in support of this motion which is being filed by hand with the Court today, Shareholder respectfully requests that the Court grant Shareholder leave to share the following documents with the Attorney General's Office: (1) Defendants CCBN.com and the Thomson Corporation's Responses and Supplemental Responses to Interrogatories Nos. 1 and 4; (2) the memorandum from Robert Adler to Jeffrey Parker Bates -labeled D000001; (3) Defendants CCBN.com and the Thomson Corporation's Response to Request for Admission No. 1; (4) the December 28, 2004 transcript of Jeffrey Parker's deposition; and (5) the March 4, 2005 and March 31, 2005 transcripts of Robert Adler's deposition.

SHAREHOLDER.COM
By its attorneys,

/s/ Melissa C. Allison
Thane Scott (BBO #449340)
Ruth T. Dowling (BBO #645568)
John T. Bennett (BBO# 648464)
Melissa C. Allison (BBO #657470)
PALMER & DODGE LLP
111 Huntington Avenue at Prudential Center
Boston, MA 02199-7613
617.239.0100

July 8, 2005

LOCAL RULE 7.1 CERTIFICATE

Counsel for Shareholder.com certifies that it conferred with counsel for the defendants, and that the parties were unable to resolve or narrow the issues presented in this motion.

/s/ Melissa C. Allison